

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

<b>UNITED STATES OF AMERICA</b>	)	Criminal No. 1:24-mj-576 (CFH)
	)	
<b>v.</b>	)	Stipulation and Order
	)	for Enlargement of Time
<b>MARK TREMBLAY,</b>	)	
	)	
<b>Defendant.</b>	)	

**STIPULATION**

The United States of America, by and through its counsel of record, the United States Attorney for the Northern District of New York, and the defendant, MARK TREMBLAY, by and through counsel, Matthew E. Trainor, hereby agree and stipulate that the time within which an indictment must be filed under Title 18, United States Code, Section 3161(b), be enlarged to and including sixty (60) days from the date of the signing of this Order and that such time be excluded, pursuant to Title 18, United States Code, Section 3161(h)(7)(A), from the computation of the time within which an indictment must be filed under the provisions of Title 18, United States Code, Section 3161(b).

- 1) The chronology of this case is as follows:
  - a) Date of complaint: December 16, 2024
  - b) Date of initial appearance: December 16, 2024
  - c) Defendant custody status: Detained
  - d) Date United States moved for detention: December 16, 2024
  - e) Date of detention hearing: Defendant waived December 16, 2024
  - f) Date detention decision issued: December 16, 2024

2) The United States and the defendant request this exclusion based on the following facts and circumstances: in order to allow for the reasonable time necessary for defense counsel to review the informal discovery that the government anticipates on providing shortly, as well as to confer with the government to pursue the negotiation of a possible disposition of the charge against the defendant and assess collateral consequences, taking into account the exercise of due diligence.

3) The parties stipulate and agree that the ends of justice served by granting this extension outweigh the best interest of the public and the defendant in a speedy indictment and trial because the continuance is necessary for the following reasons: the Government's anticipated production of informal discovery to the defense. The requested continuance allows for the reasonable time necessary for defense counsel to review such informal discovery, confer with the government to potentially pursue the negotiation of a disposition of the charge against the defendant, and research and assess collateral consequences, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

4) The parties stipulate and agree that a period of sixty (60) days, from the date of the signing of this Order, shall be excludable under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

//

//

//

//

//

//

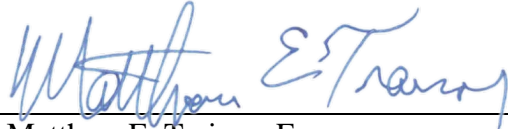
The undersigned attorneys affirm under penalty of perjury the accuracy of the facts set forth above and apply for and consent to the proposed order set forth below.

Dated: December 16, 2024

CARLA B. FREEDMAN  
United States Attorney

By: /s/ Allen J. Vickey

Allen J. Vickey  
Assistant United States Attorney  
Bar Roll No. 513696



Matthew E. Trainor, Esq.  
Attorney for MARK TREMBLAY  
Bar Roll No. 105643

**ORDER**

A. The Court adopts the stipulated facts set out above as findings and hereby incorporates them into this Order;

B. The Court has considered its obligation under 18 U.S.C. § 3161(h)(7)(A) to determine whether an extension of time within which the government must file an information or indictment serves the ends of justice in a manner that outweighs both the public interest and the defendant's rights. The Court finds that, pursuant to 18 U.S.C. § 3161(h)(7)(A), the ends of justice served by granting the requested continuance outweigh the best interest of the public and the defendant in a speedy indictment and trial because this delay is necessary in order to allow the parties reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

BASED ON THE STIPULATED FACTS AND THE COURT'S RELATED FINDINGS, IT IS HEREBY ORDERED that the time within which an indictment must be filed under the provisions of Title 18, United States Code, Section 3161(b), be enlarged to and including sixty (60) days from the date of this Order, and that time be excluded pursuant to Title 18, United States Code, Section 3161(h)(7)(A), from the computation of the time within which an indictment must be filed under the provisions of Title 18, United States Code, Section 3161(b), because the ends of justice served by granting this continuance outweigh the best interest of the public and the defendant in a speedy trial for the reasons stipulated above.

IT IS SO ORDERED.

Dated and entered this \_\_\_\_\_ day of December, 2024.

---

Hon. Christian F. Hummel  
U.S. Magistrate Judge